

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

ROBERT BENSON,

Plaintiff,

-v-

EXPERIAN FINANCIAL SOLUTIONS, INC.,

Defendant.

Civil Action No. 1:25-cv-1262

**DEFENDANT EXPERIAN INFORMATION SOLUTIONS, INC.'S  
NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. § 1441 *et seq.*, Defendant Experian Information Solutions, Inc. (“Experian”), hereby files this Notice of Removal of the above-captioned action to this Court and state as follows:

1. Experian is the only named Defendant in Case Index No. CV-503149/2025 filed by Plaintiff Robert Benson (“Plaintiff”) in the Civil Court of the City of New York, County of Kings (the “State Court Action”).

2. The Complaint in the State Court Action was filed on or about January 28, 2025. Plaintiff served his Complaint on the Secretary of State on February 3, 2025, and Experian received the Complaint on February 12, 2025.

3. This Notice is being filed with this Court within thirty (30) days after Experian received a copy of Plaintiff’s initial pleading setting forth the claims for relief upon which Plaintiff’s action is based, as required by 28 U.S.C. § 1446(b). Experian is the only Defendant to this action.

4. This Court is the proper district court for removal because the State Court Action is pending within this district.

5. Pursuant to 28 U.S.C. § 1446(a), a copy of all process, pleadings, and orders served upon Experian in the State Court Action is attached hereto as **Exhibit A**.

6. Experian is a corporation which, for monetary fees, regularly engages in whole or in part in the practice of assembling consumer credit information or other information on consumers for the purpose of furnishing consumer reports to third parties. Experian uses means or facilities of interstate commerce for the purpose of preparing or furnishing consumer reports, and therefore is a “consumer reporting agency” within the meaning of 15 U.S.C. § 1681a(f).

7. The claims for relief against Experian in the State Court Action arise under the Fair Credit Reporting Act, 15 U.S.C. §§ 1681, *et seq.* Thus, this Court has original subject matter jurisdiction over the above-captioned action pursuant to 28 U.S.C. § 1331 and 15 U.S.C. § 1681p. The above-captioned action may properly be removed to this United States District Court pursuant to 28 U.S.C. § 1441(a).

9. Promptly after the filing of this Notice of Removal, Experian shall provide notice of the removal to Plaintiff through Plaintiff’s attorney of record in the State Court Action, and shall file a copy of this Notice with the clerk of the Court in the State Court Action, as required by 28 U.S.C. § 1446(d).

DATED: March 5, 2025

/s/ Jonathan P. Floyd  
Jonathan P. Floyd  
TROUTMAN PEPPER LOCKE LLP  
1001 Haxall Point  
Richmond, Virginia 23219  
Telephone: (804) 697-1200 | Fax: (804) 697-1339  
Email: jonathan.floyd@troutman.com  
*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 5th day of March, 2025, I filed the foregoing document with the Clerk of the Court via the Court's CM/ECF System, and sent a copy of the same via U.S. Mail and electronic mail to the following party. Service of the foregoing was within the time prescribed by the Rules of the Court.

April Forbes, Esq.  
April Forbes, P.C.  
P.O. Box 865  
Hudson, New York 12534  
aforbes@esquirepc.org  
*Counsel for Plaintiff*

/s/ Jonathan P. Floyd  
Jonathan P. Floyd  
*Counsel for Defendant*